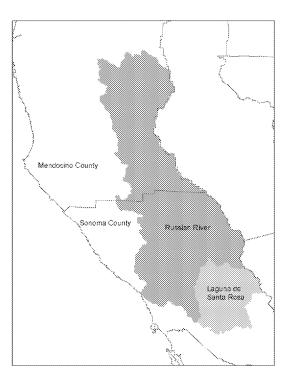


#### Laguna de Santa Rosa Watershed

- Largest tributary of Russian River (254 mi²)
- Metropolitan center of North Coast Region
- 70 mi<sup>2</sup> of "Important Farmland" (per CA Dept. of Conservation)
- Largest freshwater wetlands complex on northern CA coast
- "Wetland of International Importance" (per Ramsar)



#### **Historic Landscape Alterations**

- Widespread Urban and Agricultural Development
- Elimination of Functional Wetland and Riparian Areas
- Increased Impervious Cover
- Installation of Roads, Crossings & Bridges
- Increased Channelization & Straightening of Surface Drainage Features
- Major Re-alignment of Mark West Creek

### Laguna de Santa Rosa Watershed

#### 303(d) Impairments:

Phosphorus
Dissolved Oxygen

Sediment

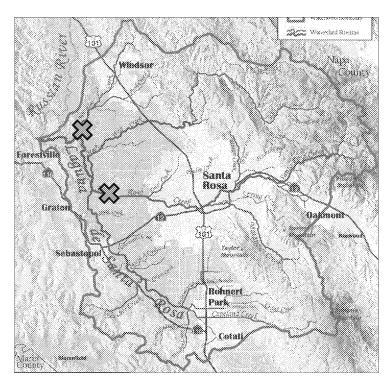
Temperature

Pathogens

Mercury

Aluminum

Manganese



# Regional Board Permitting Actions in the Laguna Watershed

**Available Science** 



Finding: No Assimilative Capacity

**NPDES Permit** 

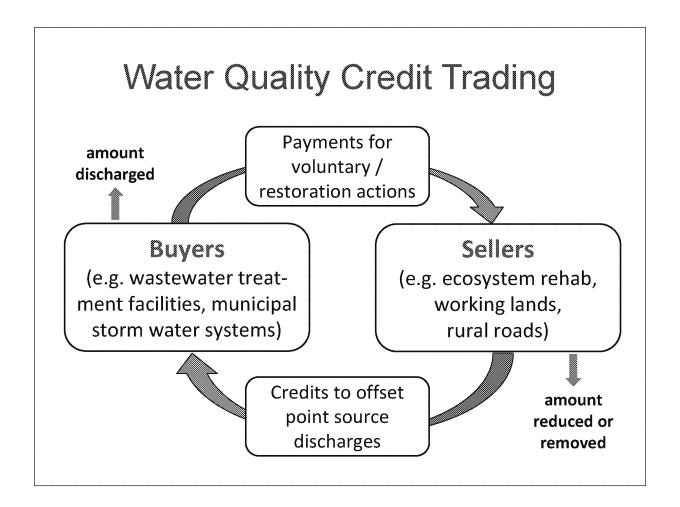


"No Net Loading" Effluent Limits

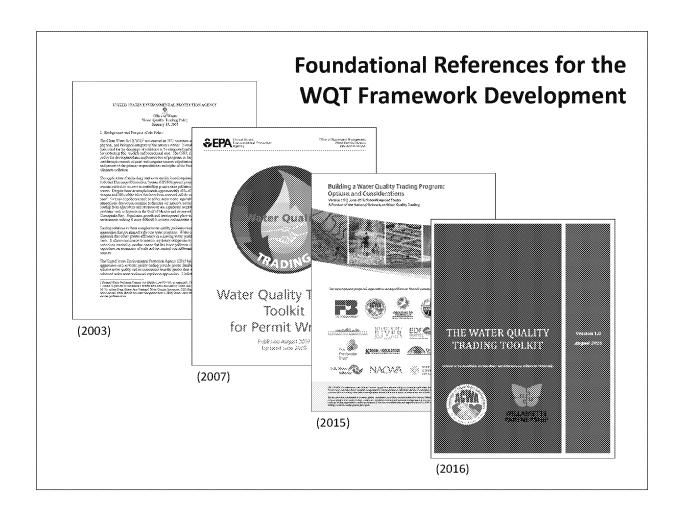
Approved
Compliance Option



Allowances for Pollutant Offsets / WQ Credit Trading



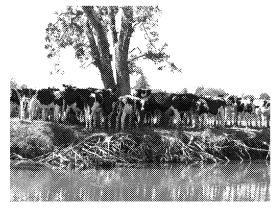




### Restoring Health to the Laguna

Reduce Pollutant Sources + Increase

+ Assimilative Capacity





Diet

+

Exercise!

## Guiding Principles for WQT in the Laguna de Santa Rosa

- All actions must be supported by sound science and accomplish regulatory and environmental goals.
- Trading activities must provide sufficient accountability, transparency, accessibility, and opportunities for public involvement to ensure that promised water quality improvements are delivered.
- The water quality benefits of any trade must be realized in place, in kind, and in time.
- Trading activities must adhere to all applicable laws.

## Equivalency / Avoiding Localized Impacts

"In Place"

• Trading area is Laguna watershed. (Section 2.3)

"In Kind"

• Currency is phosphorus. (Section 2.4)

"In Time"

• Credit banking periods are finite. (Section 6.3)

#### Trading Eligibility and Baseline

"...a pollutant reduction or removal action is <u>eligible</u> to generate water quality credits as long as it is not otherwise required." (Section 3.2)

"...<u>baseline</u> shall be defined as the minimum level of effort or level of implementation that must be achieved before a project is eligible to generate credits." (Section 3.2.2)

#### **Knowing that Credits are Real**

- Credit Quantification Methods (Section 4)
  - Specified by practice
  - May be based on literature, models, and/or direct measurement
- Project Verification Protocols (Section 8)
  - Initial for project implementation
  - Ongoing for project maintenance
- Monitoring and Reporting (Section 11)
  - Required for all projects

## Trading Ratios (Section 5)

• Uncertainty Ratio 2:1

• Retirement Ratio 0.5:1

• Total Ratio 2.5:1

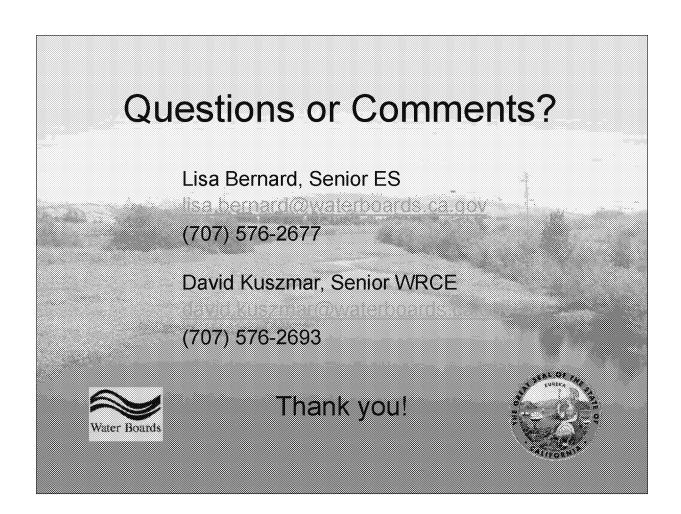
- Available Discounts:
  - Multi-benefit restoration projects
  - Projects on permanently protected lands
  - Direct measurement of pollutant reductions

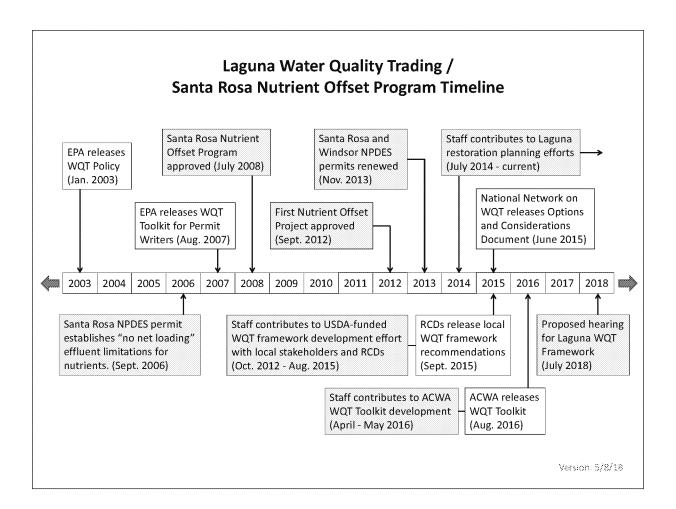
#### Incentives for Restoration Projects

- Reduced Trading Ratios (Section 5)
  - 0.5 Retirement Ratio Discount
- Longer Project Lives (Section 6.2)
  - 20 Years + Option for Project Renewal
- Increased Credit Banking Allowances (Section 6.3)
  - 5 Years before Credits are Retired

#### **Lessons Learned**

- Extensive outreach + education is key!
  - Stakeholders distrust markets
  - Waterboards have authority to regulate CA
- Robust procedures for are essential for success.
  - Burden of program implementation is high
- Real water quality benefits can be realized.





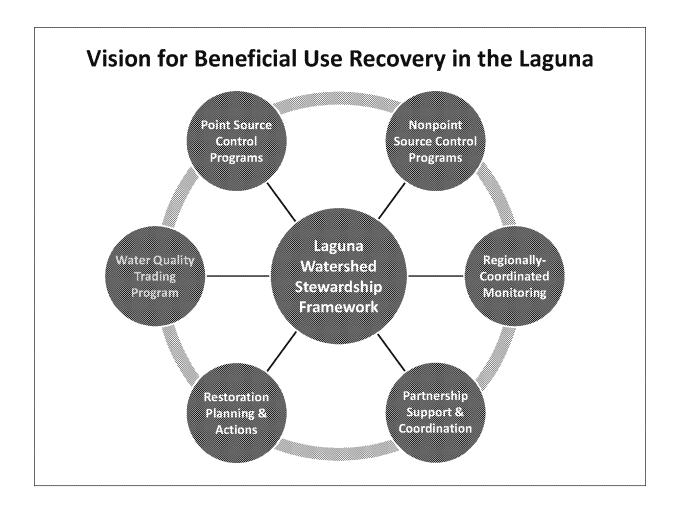
#### Permit / Program History

#### No Net Loading Effluent Limitations in NPDES Permits

- 2006: City of Santa Rosa (N & P)
- 2013: City of Santa Rosa & Town of Windsor (P)

#### Santa Rosa Nutrient Offset Program (2008)

- Sept 2012: Beretta Dairy (1,689 lbs)
- Oct 2012: Pepperwood Preserve (2,678 lbs)
- Jan 2013: Ocean View Dairy (21,932 lbs)
- Compliance Achieved to Date!



## **Evolution of the Laguna**Water Quality Trading (WQT) Framework

Santa Rosa Nutrient Offset Program (2008) Laguna WQT Framework (2018) Possible Future WQT Framework (*TBD*)

Acknowledged Impairment

**Pre-TMDL Approval** 

**Post-TMDL Approval** 

1<sup>st</sup> Generation: Establish Compliance Option 2<sup>nd</sup> Generation: Improve / Expand Compliance Options 3<sup>rd</sup> Generation: Expand Use of WQT for Greatest Effect

